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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DONALD R. CAMERON, *et al.*,

Plaintiffs

v.

APPLE INC.,

Defendant.

Case No. 4:19-cv-03074-YGR-TSH

**JOINT STIPULATION AND [PROPOSED]
ORDER RE: PARTIAL SEALING OF THE
COURTROOM FOR HEARING ON
MOTION FOR SANCTIONS**

Hon. Thomas S. Hixson

WHEREAS, the Court has set Defendant Apple Inc.'s motion for sanctions for hearing on February 18, 2021 at 8:30 A.M.,

WHEREAS, the parties anticipate that the hearing will include discussion of information designated by Apple in discovery as HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY;

WHEREAS, the parties disagree as to the confidentiality of the information;

WHEREAS, Apple submits that the information implicates its sensitive business relationships with key partners;

WHEREAS, Plaintiffs submit that the information is in the public domain and thus not confidential;

WHEREAS, notwithstanding the foregoing, the Parties agree that partial sealing of the hearing is appropriate to ensure that no confidential information is disclosed to the public;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties:

The portions of the hearing on Apple's motion for sanctions discussing information designated by Apple in discovery as HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY should be sealed. A party intending to discuss such information should advise the Court before doing so to permit the Court to seal the hearing as appropriate.

Dated: February 15, 2021

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Ben M. Harrington
Ben M. Harrington

Interim Class Counsel for the Developer Plaintiffs

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Ethan Dettmer
Ethan Dettmer

Attorney for Defendant Apple Inc.

[PROPOSED] ORDER

Pursuant to the above stipulation,

IT IS SO ORDERED.

DATED: _____

Honorable Thomas S. Hixson
United States Magistrate Judge

FILING ATTESTATION

I, Ethan Dettmer, am the ECF user whose ID and password are being used to file this Joint Stipulation. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all parties have concurred in this filing.

DATED: February 15, 2021

By: /s/ Ethan Dettmer
Ethan Dettmer